

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA**

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IN THE MATTER OF:

THE GREAT PLATTE RIVER ROAD  
MEMORIAL FOUNDATION,

Debtor.

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CASE NO. BK 13-40411  
CHAPTER 11

**APPLICATION FOR ORDER TO  
EMPLOY COUNSEL**

The Great Platte River Road Memorial Foundation, Debtor in the above-referenced case ("Debtor"), for its Application for Order to Employ Counsel, states as follows:

1. On March 6, 2013, the Debtor filed Chapter 11 bankruptcy with this Court. The Debtor hereby applies to the Court for an order approving the employment of the law firm of Baird Holm LLP, ("Baird Holm") as counsel for the Debtor.

2. Baird Holm is well qualified to serve as counsel to the Debtor because its attorneys have substantial bankruptcy, insolvency and litigation experience.

3. Baird Holm has agreed to provide professional services at its regular hourly rates for Baird Holm attorneys. The current hourly rate for T. Randall Wright for bankruptcy matters such as these is \$325 per hour. The current hourly rate Eric J. Adams is \$160 per hour. Legal assistants will provide services at from \$135 to \$140 per hour. Associates will bill at their regular hourly rates of between \$130 per hour to \$325 per hour.

4. Baird Holm from time to time represents Wells Fargo Bank, which is Trustee of the Bonds owed by the Debtor. Wells Fargo has waived the conflict and it is

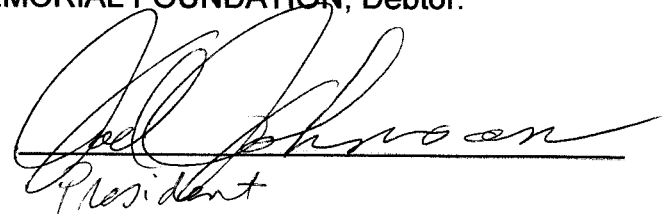
represented by other counsel in this case. In addition, Baird Holm from time to time has done work for the City of Kearney, unrelated to the Debtor. The City of Kearney is a creditor. The City of Kearney has waived the conflict. With those exceptions, insofar as the Debtor has been made aware, Baird Holm does not represent any interest adverse to the estate in this matter.

The employment of Baird Holm is in the best interests of the Debtor.

Dated this 28<sup>th</sup> day of March, 2013.

THE GREAT PLATTE RIVER ROAD  
MEMORIAL FOUNDATION, Debtor.

By:



President

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